

Message

From: Hambrick, Amy [Hambrick.Amy@epa.gov]
Sent: 9/20/2018 5:00:29 PM
To: Witt, Jon [Witt.Jon@epa.gov]; Mia, Marcia [Mia.Marcia@epa.gov]; Vazquez, Natalia [Vazquez.Natalia@epa.gov]; Lundelius, Diana [Lundelius.Diana@epa.gov]; Topinka, Natalie [topinka.natalie@epa.gov]; Beeler, Cindy [Beeler.Cindy@epa.gov]
CC: Vyas, Himanshu [vyas.himanshu@epa.gov]; augustine, bruce [augustine.bruce@epa.gov]
Subject: RE: NSPS OOOOa annual certification question - Reporting to CEDRI?

Natalie- This is a general response that I crafted and have been using for reporting questions in the recent weeks, you may find it useful . With the caveat that R6 is only accepting via email.

While the CEDRI template is still considered draft, the reports are required to be submitted- this can be done by submitting it to your delegated authority or through CEDRI. CEDRI is available to accept the 60.5420a(b) and 60.5422a(a) and (b) reports. Because EPA's template on the website you referenced is still considered "draft", the requirement to submit only through CEDRI is not triggered. Once the report is "final" then CEDRI reporting is mandatory. Hence, in the meantime, the report still must be submitted, but the vehicle to do that is either submit to delegated authority or through CEDRI. Make sense?

So from the reg text, once the **[final]** form has been available in CEDRI for 90 days, submittal through CEDRI is required. Up to this 90 day marker, submittal can be either CEDRI or the delegated authority. Excerpt from the reg text FYI:

"You must submit reports to the EPA via the CEDRI. (CEDRI can be accessed through the EPA's CDX (<https://cdx.epa.gov/>)). You must use the appropriate electronic report in CEDRI for this subpart or an alternate electronic file format consistent with the extensible markup language (XML) schema listed on the CEDRI Web site (<https://www3.epa.gov/ttn/chief/cedri/>). If the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, you must submit the report to the Administrator at the appropriate address listed in §60.4. Once the form has been available in CEDRI for at least 90 calendar days, you must begin submitting all subsequent reports via CEDRI. The reports must be submitted by the deadlines specified in this subpart, regardless of the method in which the reports are submitted."

Furthermore, as you may know, after OOOOa was finalized in 2016, EPA received administrative petitions seeking reconsideration of various aspects of the 2016 NSPS. EPA sent letters to petitioners granting reconsideration on April 18, 2017 and on June 5, 2017, EPA issued a *Federal Register* notice granting reconsidering on additional requirements. See proposal here: <https://www.epa.gov/controlling-air-pollution-oil-and-natural-gas-industry/proposed-improvements-2016-new-source> . The public will have an opportunity to comment on the template to help make it better. Be sure to stay plugged in and submit your comments.

Amy Hambrick
U.S. Environmental Protection Agency
(919)541-0964

From: Witt, Jon

Sent: Thursday, September 20, 2018 11:58 AM

To: Mia, Marcia <Mia.Marcia@epa.gov>; Vazquez, Natalia <Vazquez.Natalia@epa.gov>; Lundelius, Diana <Lundelius.Diana@epa.gov>; Hambrick, Amy <Hambrick.Amy@epa.gov>; Topinka, Natalie <topinka.natalie@epa.gov>; Beeler, Cindy <Beeler.Cindy@epa.gov>

Cc: Vyas, Himanshu <vyas.himanshu@epa.gov>; augustine, bruce <augustine.bruce@epa.gov>

Subject: RE: NSPS OOOOa annual certification question

Assuming I'm understanding the discussion correctly, operators are required to submit 5422a(a) and 5422a(b) reports through CEDRI, but not annual reports. The CEDRI template for annual reports is still technically in a draft format and has been since 10/6/17.

Let me know if you have any further questions,
Jonathan

From: Mia, Marcia

Sent: Thursday, September 20, 2018 11:49 AM

To: Vazquez, Natalia <Vazquez.Natalia@epa.gov>; Lundelius, Diana <Lundelius.Diana@epa.gov>; Hambrick, Amy <Hambrick.Amy@epa.gov>; Topinka, Natalie <topinka.natalie@epa.gov>; Beeler, Cindy <Beeler.Cindy@epa.gov>; Witt, Jon <Witt.Jon@epa.gov>

Cc: Vyas, Himanshu <vyas.himanshu@epa.gov>; augustine, bruce <augustine.bruce@epa.gov>

Subject: RE: NSPS OOOOa annual certification question

That is confusing. I am cc'ing Jon Witt so he can clarify. I am going by the Oil and Gas page and my understanding from past conversations with Jon about the status of the template and CEDRI: <https://www.epa.gov/controlling-air-pollution-oil-and-natural-gas-industry/implementation-oil-and-natural-gas-air#report>

OOOOa Reporting

October 6, 2017- EPA posts [template spreadsheet](#) for reporting data required by the 2016 New Source Performance Standards. The 2016 standards include several electronic reporting requirements using the agency's [Compliance and Emissions Data Reporting Interface \(CEDRI\)](#). CEDRI can now collect these reports electronically, although the final template is not available. Until the final template is available in CEDRI, facilities may submit the Annual Report through CEDRI, but also must submit the report to the appropriate address(es) listed in 60.4(a) and (b). Note, facilities are not required to electronically submit the Annual Report until 90 days after the final template has been made available in CEDRI. EPA will update this page when final electronic reporting forms are available.

- [60.5420a\(b\) Annual Report \(Spreadsheet Template\)](#)
- [60.5422a\(a\) Semiannual Report \(Spreadsheet Template\)](#)
- [60.5422a\(b\) Initial Semiannual Report \(Spreadsheet Template\)](#)

Marcia B Mia

Air Branch

Office of Compliance

2227A WJCS

U.S. Environmental Protection Agency

202-564-7042

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From: Vazquez, Natalia
Sent: Thursday, September 20, 2018 11:43 AM
To: Mia, Marcia <Mia.Marcia@epa.gov>; Lundelius, Diana <Lundelius.Diana@epa.gov>; Hambrick, Amy <Hambrick.Amy@epa.gov>; Topinka, Natalie <topinka.natalie@epa.gov>; Beeler, Cindy <Beeler.Cindy@epa.gov>
Cc: Vyas, Himanshu <vyas.himanshu@epa.gov>; augustine, bruce <augustine.bruce@epa.gov>
Subject: RE: NSPS OOOOa annual certification question

Marcia,

In the link below, there is one template that is identified as draft and two available template that are not identified as draft under OOOOa. Also, my understanding is that the rule requires them to use CEDRI. If we are not yet requiring them to use CEDRI, where is that stated?

<https://www.epa.gov/electronic-reporting-air-emissions/compliance-and-emissions-data-reporting-interface-cedri#list>

Natalia Vazquez
Environmental Engineer
Office of Air Enforcement and Compliance Assistance
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215-814-2121

From: Mia, Marcia
Sent: Thursday, September 20, 2018 11:37 AM
To: Lundelius, Diana <Lundelius.Diana@epa.gov>; Vazquez, Natalia <Vazquez.Natalia@epa.gov>; Hambrick, Amy <Hambrick.Amy@epa.gov>; Topinka, Natalie <topinka.natalie@epa.gov>; Beeler, Cindy <Beeler.Cindy@epa.gov>
Cc: Vyas, Himanshu <vyas.himanshu@epa.gov>; augustine, bruce <augustine.bruce@epa.gov>
Subject: RE: NSPS OOOOa annual certification question

Natalie,

Which "final" template are you referring to in the highlight below? There is no final template available so we cannot require its use, yet. Likewise, we are not yet requiring submittal via CEDRI. As for R6's procedure, that is their own construct to use the mailbox and it apparently works for them.

Marcia B Mia
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From: Lundelius, Diana
Sent: Thursday, September 20, 2018 11:13 AM
To: Vazquez, Natalia <Vazquez.Natalia@epa.gov>; Hambrick, Amy <Hambrick.Amy@epa.gov>; Topinka, Natalie <topinka.natalie@epa.gov>; Beeler, Cindy <Beeler.Cindy@epa.gov>; Mia, Marcia <Mia.Marcia@epa.gov>
Cc: Vyas, Himanshu <vyas.himanshu@epa.gov>; augustine, bruce <augustine.bruce@epa.gov>
Subject: RE: NSPS OOOOa annual certification question

For facilities in Region 6, they can submit their reports and certifications electronically by email to R6WellCompletion@epa.gov. We do not accept paper copy reports. They can use the CEDRI template or their own company template until changes to the rule are final. After the rule changes are finalized, the CEDRI template will become final, and then they must report via CEDRI. They will also need to submit their certifications and reports to the States according to each state's available methods (email, state electronic portal, paper etc). If they have further questions about report submission for R6 states, they can email me.

FYI, in Region 6 Cabot Oil & Gas sold all of their assets to Venado Operating in Feb 2018. You may want to check to see what the status of their ownership is in your region.

Diana L Lundelius CHMM
Senior Enforcement Officer
Lean Six Sigma Black Belt
R6 NSPS OOOO/OOOOa Coordinator
Fellow of the Institute of Hazardous Materials Management
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"Courage is the willingness to proceed with positive change, even if the outcome is uncertain."

Connect with me on Linked In, <https://www.linkedin.com/in/diana-l-lundelius-chmm-a6b98917/>.

From: Vazquez, Natalia

Sent: Thursday, September 20, 2018 9:58 AM

To: Hambrick, Amy <Hambrick.Amy@epa.gov>; Topinka, Natalie <topinka.natalie@epa.gov>; Beeler, Cindy <Beeler.Cindy@epa.gov>; Mia, Marcia <Mia.Marcia@epa.gov>; Lundelius, Diana <Lundelius.Diana@epa.gov>

Cc: Vyas, Himanshu <vyas.himanshu@epa.gov>; augustine, bruce <augustine.bruce@epa.gov>

Subject: NSPS OOOOa annual certification question

Hi,

I got a question from Cabot Oil and Gas. They are asking if they can submit their NSPS OOOOa annual certification by mail instead of using the CEDRI template, due to the rule being under reconsideration. The facility's contact person sent me some emails between Region 6 and another company related to this question. I know that they can submit it to us without using CEDRI and the template, because the template is in draft format. My question is can they ignore any other template available for NSPS OOOOa that is finalize due to the rule being under reconsideration?

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